

**SEALED**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT

CRUZ VALDIVIESO FIGUERA,

Plaintiff,

vs.

ALL VIP CARE INC.,

Defendant,

and

PNC BANK, N.A.,

Garnishee.

**WRIT OF GARNISHMENT**

THE STATE OF FLORIDA

TO THE UNITED STATES MARSHALL FOR THE SOUTHERN DISTRICT OF  
FLORIDA AND EACH SHERIFF OF THE STATE OF FLORIDA:

YOU ARE COMMANDED to summon the Garnishee:

PNC BANK, N.A.  
800 BRICKELL AVE  
STE 106  
MIAMI, FL 33131

to serve an answer to this writ on Brian H. Pollock, Esq., FairLaw Firm, as Plaintiff's attorney, whose address is 135 San Lorenzo Avenue, Suite 770, Coral Gables, FL 33146, [brian@fairlawattorney.com](mailto:brian@fairlawattorney.com), within 20 days after service on the garnishee, exclusive of the day of service, and to file the original with the clerk of this court either before service on the attorney or immediately thereafter, stating whether the garnishee is indebted to Defendant, ALL VIP CARE INC., at the time of the answer or was indebted at the time of service of the Writ, or at any time between such times, and in what sum and what tangible and intangible personal property of the defendant the garnishee is in possession or control of at the time of the answer or had at the time of service of this Writ, or at any time between such times, and whether the garnishee knows of any other person indebted to the Defendant or who may be in possession or control of any of the property of the Defendant. The principal amount in the Motion is \$149,073.91, together with

**EXHIBIT A**

interest accruing at the current legal interest rate allowed pursuant to 28 U.S.C. §1961, since September 4, 2024.

The Garnishor will provide the Garnishee with the statutory fee required by Florida law upon demand by the Garnishee.

Dated on Sep 20, 2024

ANGELA NOBLE  
CLERK OF THE COURT

BY: s/K. Pierre  
DEPUTY CLERK

*Counsel for Garnishor:*  
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Angela E. Noble  
Clerk of Court

## SUMMONS

s/ K. Pierre

Deputy Clerk  
U.S. District Courts